

IN THE UNITED STATE BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

IN RE	:	Chapter 11
	:	
A.B. DICK COMPANY, <i>et al.</i> ,	:	Case No. 04-12002 (CGC)
	:	
Debtors.	:	Jointly Administered
	:	
A.B. DICK COMPANY,	:	
	:	
Plaintiff,	:	
	:	
v.	:	Adv. Pro. No. 04-54141
	:	
MHR CAPITAL PARTNERS LP,	:	
MHR INSTITUTIONAL PARTNERS LP,	:	
and MHRM LP,	:	
	:	
Defendants,	:	
	:	
MHR CAPITAL PARTNERS LP,	:	
MHR INSTITUTIONAL PARTNERS LP,	:	
and MHRM LP,	:	
	:	
Third-Party Plaintiffs,	:	
	:	
v.	:	
	:	
N.E.S. INVESTMENT COMPANY;	:	
ROBERT J. TOMSICH; JOHN H. FOUNTAIN;	:	
A. KEITH DREWETT; JOHN R. TOMSICH,	:	
FRANK D. ZAFFINO; GREGORY T. KNIPP;	:	
JAMES W. WERT; JOHN KAHL, JR.;	:	
DONALD HASTINGS;	:	
BROWN, GIBBONS, LANG & COMPANY, L.P.;	:	
and SQUIRE SANDERS & DEMPSEY L.L.P.,	:	
	:	
Third-Party Defendants.	:	

**CERTIFICATION OF COMPLETION OF BRIEFING ON
JOINT MOTION OF THIRD-PARTY DEFENDANTS TO
WITHDRAW THE REFERENCE TO THE BANKRUPTCY COURT**

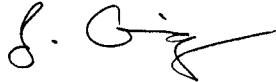
THE UNDERSIGNED COUNSEL to N.E.S. Investment Company (“NES” and, together with the other above-captioned third-party defendants, the “Third-Party Defendants”), hereby certifies that briefing on the Third-Party Defendants’ Joint Motion To Withdraw The Reference To The Bankruptcy Court (the “Motion To Withdraw”) has been completed. The following pleadings and other documents are relevant to the Court’s consideration of the Motion To Withdraw, and have been provided to the Court:

1. Joint Motion Of Third-Party Defendants To Withdraw The Reference To Bankruptcy Court (Filed November 23, 2004, D.I. No. 28).
2. Memorandum Of Law In Support of Joint Motion Of Third-Party Defendants To Withdraw The Reference To Bankruptcy Court (Filed November 23, 2004, D.I. No. 28, Exh. “A”).
3. Stipulation And Order Extending Time Within Which MHR Capital Partners LP, MHR Institutional Partners LP, And MHRM LP Must Respond To Certain Motions Filed By Third-Party Defendants (Filed December 2, 2004, D.I. No. 43).
4. Order Determining The Proceedings For Which Withdrawal Of The Reference Is Sought Are Non-Core Proceedings (Entered January 3, 2005, D.I. No. 52).
5. Motion Of Third-Party Plaintiffs And MHR Fund Management LLC To Withdraw The Reference Of The Entire Adversary Proceeding (Filed January 17, 2004, D.I. No. 62).
6. Memorandum Of Law Of (A) Third-Party Plaintiffs In Response To Third-Party Defendants’ Joint Motion To Withdraw The Reference And, (B) Third Party Plaintiffs And MHR Fund Management LLC In Support Of Their Motion To Withdraw The Reference Of The Entire Underlying Adversary Proceeding (Filed January 17, 2005, D.I. No. 64).
7. Reply Memorandum In Support Of Joint Motion Of Third-Party Defendants To Withdraw The Reference To Bankruptcy Court (Filed January 25, 2005, D.I. No. 68).
8. Plaintiffs’ Memorandum Of Law In Opposition To Motion Of Third-Party Plaintiffs And MHR Fund Management LLC To Withdraw The Reference Of The Entire Underlying Adversary Proceeding (Filed January 28, 2005, D.I. No. 71).

The Third-Party Defendants respectfully request that the Court schedule a hearing on the Motion To Withdraw, at which oral argument may be presented.

Date: March 2, 2005
Wilmington, Delaware

Respectfully submitted,



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Third-Party Defendant*